

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

AMF BOWLING CENTERS, INC.;
BOWLERO CORP.,

Plaintiffs,

vs.

THOMAS TANASE,

Defendant.

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Civil Action No. 3:23-cv-00448-HEH

**PLAINTIFFS' MOTION TO COMPEL
FURTHER DEPOSITION OF DEFENDANT**

Pursuant to Federal Rule of Civil Procedure 37, the Local Rules of the United States District Court for the Eastern District of Virginia (the “Local Civil Rules”), and the Court’s March 21, 2024 Order (ECF 91), Plaintiffs AMF Bowling Centers, Inc. and Bowlero Corp. (collectively, “Bowlero”), by counsel, respectfully move the Court for an order compelling the further deposition of Defendant Thomas Tanase (“Mr. Tanase”). As discussed in the accompanying Memorandum of Law, Mr. Tanase has waived any applicable privilege over certain communications.

Bowlero respectfully requests that this Court enter an Order:

1. compelling Mr. Tanase to attend an additional one-hour, virtual deposition and provide testimony to the Disputed Questions (as more fully described in the accompanying Memorandum of Law), along with additional testimony to any related questions resulting from his testimony to the Disputed Questions.
2. providing any other relief the Court deems just and proper.

Dated: March 29, 2024

Respectfully submitted,

**AMF BOWLING CENTERS, INC.
and BOWLERO CORP.**

/s/ Neil S. Talegaonkar

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*Counsel for Plaintiffs AMF Bowling Centers, Inc.
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CERTIFICATION OF CONFERRING WITH OPPOSING COUNSEL

I hereby certify under Local Rule 37(E) that a good faith effort has been made between counsel to resolve the discovery matters at issue prior to bringing this motion.

/s/ Neil S. Talegaonkar

Neil S. Talegaonkar

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of March, 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel for Defendant Thomas Tanase:

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